

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25–10068 (CTG)

(Jointly Administered)

Hearing Date: April 3, 2025 at 1:00 p.m. (ET)

Objection Deadline: March 14, 2025 at 4:00 p.m. (ET)

**NOTICE OF APPLICATION OF THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS FOR ENTRY
OF AN ORDER AUTHORIZING THE EMPLOYMENT OF KELLEY
DRYE & WARREN LLP AS LEAD COUNSEL EFFECTIVE AS OF JANUARY 30, 2025**

PLEASE TAKE NOTICE that on February 28, 2025, the Official Committee of Unsecured Creditors (the “Committee”) of JOANN Inc., *et al.*, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), filed the attached *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment of Kelley Drye & Warren LLP as Lead Counsel Effective as of January 30, 2025* (the “Application”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that responses or objections, if any, to the Application shall conform with the Bankruptcy Code, the Bankruptcy Rules and the Delaware Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and shall be filed with the Court and served upon the undersigned so as to be received no later than **4:00 p.m. (ET) on March 14, 2025**.

PLEASE TAKE FURTHER NOTICE that the Application will be considered at a

¹ The Debtors in these chapter 11 cases are: JOANN Inc.; Needle Holdings LLC; Jo-Ann Stores, LLC; Creative Tech Solutions LLC; Creativebug, LLC; WeaveUp, Inc.; JAS Aviation, LLC; joann.com, LLC; JOANN Ditto Holdings Inc.; Dittopatterns LLC; JOANN Holdings 1, LLC; JOANN Holdings 2, LLC; and Jo-Ann Stores Support Center, Inc.

hearing on **April 3, 2025, at 1:00 p.m. (ET)**, or as soon thereafter as counsel may be heard, before the Honorable Craig T. Goldblatt, United States Bankruptcy Judge for the District of Delaware, 824 North Market Street, 3rd Floor, Courtroom 7, Wilmington, Delaware 19801.

PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS TO THE APPLICATION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THE ABOVE PROCEDURES, AN ORDER MAY BE ENTERED GRANTING THE RELIEF REQUESTED BY THE APPLICATION WITHOUT FURTHER NOTICE OR HEARING.

Dated: February 28, 2025
Wilmington, Delaware

/s/ James E. O'Neill
PACHULSKI STANG ZIEHL & JONES LLP
Bradford Sandler (DE Bar No. 4142)
James E. O'Neill (DE Bar No. 4042)
919 North Market Street 17th Floor
P.O. Box 8705
Wilmington, DE 19899-8705 (Courier 19801)
Tel: (302) 652-4100
Fax: (302) 652-4400
Email: bsandler@pszjlaw.com
joneill@pszjlaw.com

and

KELLEY DRYE & WARREN LLP
Eric R. Wilson (admitted *pro hac vice*)
Jason R. Adams (admitted *pro hac vice*)
Maeghan J. McLoughlin (admitted *pro hac vice*)
3 World Trade Center
175 Greenwich Street
New York, New York 10007
Tel: (212) 808-7800
Fax: (212) 808-7897
Email: ewilson@kelleydrye.com
jadams@kelleydrye.com
mmcloughlin@kelleydrye.com

*Proposed Counsel to the Official Committee of
Unsecured Creditors of JOANN Inc., et al.*